

SUBPOENA
DUCES TECUM

STATE OF OHIO,
COUNTY OF FRANKLIN, SS:
DAVE YOST

IN THE MATTER OF THE AUDITOR OF STATE
Investigation OF:
Pike County Sheriff's Office
Pike County, Ohio

TO: **Pike County Auditors Office**
230 Waverly Plaza #200
Waverly, OH 45690

BY AUTHORITY OF SECTION 117.18 OF THE OHIO REVISED CODE:

You are hereby directed to provide to me and/or my designated representative **immediately upon service**, of this subpoena on the 13 day of **December, 2018** the following books, records, documents or other items, which are in your custody or under your control:

SEE ATTACHED.

YOU WILL PLEASE TAKE NOTE:

Section 9.84 of the Ohio Revised Code provides that: "Any person appearing as a witness before any public official, department board, bureau, commission, agency or representative thereof, in any administrative or executive proceeding or investigation, public or private, if he so requests, shall be permitted to be accompanied, represented, and advised by an attorney, whose participation in the hearing shall be limited to the protection of the rights of the witness, and who may not examine or cross-examine witnesses, and the witness shall be advised of his right to counsel before he is interrogated."

Witness my hand at Columbus, Ohio, this 12th day of December, 2018.

Cheyl S. Gray
NOTARY PUBLIC



CHERYL SUE GRAY
Notary Public, State of Ohio
My Commission Expires 07-21-2023

Robert F. Smith

Robert F. Smith
Legal Counsel, Public Integrity Assurance Team
State of Ohio, Auditor of State
88 East Broad Street, 9th Floor
Columbus, Ohio 43216-1140

TO BE COMPLETED BY INDIVIDUAL SERVING SUBPOENA:

Received this Writ 12/13/18, 2018, and served the same on Enca Snodgrass
(date of service) (name of individual served)

Auditor the within-named witness at 1:25 o'clock P.m., on 12/13, 2018
(title/relationship of individual served)

at 230 WAVERLY PLAZA
(address of service)

by delivering to and leaving with him/her personally a true and correct original hereof.

ID-0010221

Insp B. Cannon
(signature of serving party)

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The subpoenaed party, **Pike County Auditor's Office** is directed to produce for inspection and copying any and all original documents in its possession or control, or in the possession or control of **Pike County Auditor's Office** agents, subsidiaries, or affiliated companies, partnerships or firms, that were obtained, collected, copied, created, written, generated, read, reviewed, analyzed or used in any fashion, whether directly or indirectly, by **Pike County Auditor's Office**, and any of its partners, shareholders, officers, employees and/or agents;

In order to complete our review of documents related to the Investigation of the Pike County Sheriff's Office, we are requesting the following documents:

See ATTACHMENT "A".

The Auditor of State reserves the right to request further documentation based on the response to the items identified after our review.

For the purpose of the subpoena *duces tecum*, the term "document" or "documents" shall be defined to the broadest extent permitted by Rule 34 of the Ohio Rules of Civil Procedure and includes, whenever applicable and without limitation, the original (absent the original, a copy) of magnetically, optically, visually or aurally stored or produced, including, but not limited to, letters; correspondence; memoranda; telegrams; notes; reports; compilations; data; notebooks; laboratory notebooks; working papers; spreadsheets; graphs; charts; blueprints; books; pamphlets; brochures; circulars; manuals; instructions; ledgers; drawings; including engineering, assembly and detailed drawings, sketches; photographs; diaries; sales literature; advertising literature; agreements; minutes; and sound reproductions; printout sheets; summaries of records of telephone conversations, personal conversations or interviews; and any and all other writings, typings, printings, drafts, copies and/or mechanical, magnetic, optic or photographic reproductions or recordings thereof in the possession, custody or control of **Pike County Auditor's Office**, or known to **Pike County Auditor's Office**. "Document" or "documents" also includes all copies which are not identical to the originals, such as those bearing marginal comments, alterations, notes or other notations not present on the original document as originally written, typed or otherwise prepared.

For the purposes of this subpoena *duces tecum*, the term "original" shall have the same meaning as in Rule 1001(3) of the Ohio Rules of Evidence and shall also include any duplicates, as that term is defined in Rule 1001(4) of the Ohio Rules of Evidence, of any documents the originals of which are not in the possession of **Pike County Auditor's Office**.

If you have any questions, please contact Diane M. Corey, Investigator, at 513-315-2564 or DMCorey@ohioauditor.gov.

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Please provide the following documents and/or records related to the **Pike County Sheriff's Office** for the period **January 1, 2016 through the present** ("Period"):

1. A disbursement ledger and vendor list, showing all disbursements and/or expenditures made on behalf of the Sheriff's Office during the Period, including vendor specific lists for the following vendors:
 - a. A. L. H. Contracting LLC and/or William Haggy and/or Amy Haggy;
 - b. Foill Inc. and/or Frederick "Chip" Foill and/or Margaret Foill;
 - c. Vallery Chevrolet and/or Lance Vallery;
 - d. All State Fire and Security LLC and/or Nathan Bloss;
 - e. Riggs Body Shop and/or Elias Riggs and/or Ethan Riggs;
 - f. B & C Communications;
 - g. Waverly Tire;
 - h. Radio Station WKSJ;
 - i. Charles Donahue;
 - j. James "Smiley" Allen;
 - k. Thomas Andrew Pate.
2. For each of the vendors listed above, provide the following for the Period:
 - a. Voucher packets and payment documents;
 - b. Billing and/or account statements;
 - c. Invoices;
 - d. Sales receipts and/or receiving documents;
 - e. Purchase orders, work orders and purchase orders outstanding;
 - f. Any other evidence of expenditures showing the vendor names and items purchased;
 - g. All checks or other documentation of payments for such purchases.
3. All contracts with vendors doing business with the Sheriff's Office, including the following:
 - a. Contracts and/or agreements with the vendors;
 - b. Requests for Proposals;
 - c. Bid packets and bid opening documentation.
 - d. Any and all bank accounts under the direct control of Sheriff Charles Reader in his capacity as Sheriff of Pike County, Ohio
4. An inventory list and/or inventory records for assets maintained by, purchased by, and/or assigned to the Sheriff's Office.
5. All records and/or documents related to the Sheriff's Law Enforcement Trust Fund (LETf), Furtherance of Justice Fund (FOJ), Pike County Drug Task Force and/or Drug Fine Monies, including but not limited to the following:
 - a. Annual reports;

ATTACHMENT "A".

- b. Check registers, ledgers, expenditure and/or cash disbursement ledgers and journals;
 - c. Policies and/or procedures manuals;
 - d. Bank statements and reconciliation documents;
 - e. Supporting documentation for all disbursements and/or expenditures from the funds.
6. All records of seizures of monies, property, vehicles, and/or equipment executed by the Sheriff's Office during the Period, including but not limited to the following:
- a. Policies and procedures regarding seizures or forfeitures;
 - b. The date of seizure and amount of monies or property seized or acquired;
 - c. The disposition of the monies or property, including information regarding the manner in which disposed;
 - d. An itemized list of the specific expenditures made with forfeited funds.
7. All payroll records for the Period and personnel files, for the following individuals:
- Pike County Sheriff Charles Reader
 - Brian Reader, Chief Investigator for Pike County Prosecutor and Special Duty Officer
 - Jason Savage, Special Deputy to the Prosecutor
 - Robert Barbe, Chief Deputy
 - James Dixon, Chief Deputy
 - William Stansberry, Deputy
 - Beau Romine, Deputy
 - Morgan Music, Deputy
 - Adam Ball, Deputy
 - Major Roosa, Deputy (Evidence/Property Room)
 - Amy Haggy, Jail Administrative Assistant
 - Rhonda Potter, Administrative Assistant
 - Charles Donahue, maintenance worker
 - Ethan Riggs, correction officer
 - Rebecca Hall
 - Major Ryan Bentley

The records responsive to number 7 should include, but not be limited to, the following:

- a. Personnel files;
- b. Applications for employment, including resumes and cover letters;
- c. Employment contracts;
- d. Records of disciplinary and/or termination actions;
- e. Payroll and payment records, including records of electronic fund transfers;
- f. Leave balances, usage reports and request forms;
- g. W-2's and/or 1099's issued;
- h. Expense reports and corresponding payment records;
- i. Documentation of outside employment.